Meetings with FDA

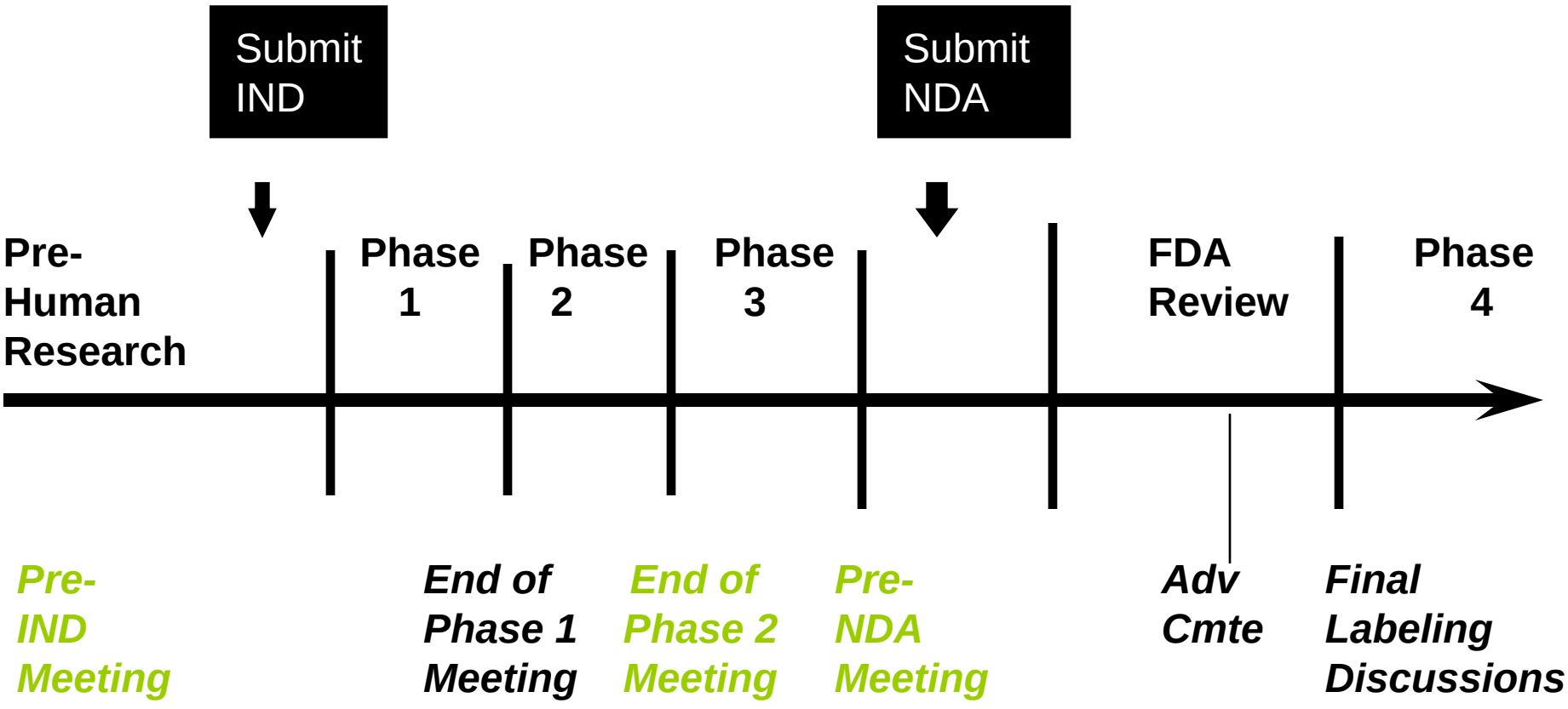
Judit Milstein

Chief Project Management Staff

Division of Special Pathogen and Transplant Products
Center for Drug Evaluation and Research

Email: judit.milstein@fda.hhs.gov
(301) 796-0763

MEETINGS WITH THE FDA



Other meetings as special issues arise

Meetings

- Pre-IND
- End of Phase 1 (EOP1)
- End of Phase 2 (EOP2)
- Pre-NDA/pre-BLA
- How do I request a meeting?
- Meeting granted-What to expect afterwards
- Comments and useful tips

Pre-IND Meeting

- 21 CFR 312.82 (a)
- Objectives:
  - to review and reach agreement on the design of animal studies needed to initiate human testing
  - To discuss the scope and design of Phase 1 testing, plans for studying the drug product in pediatric populations and best approach for presentation and formatting of data in the IND

Pre-IND meetings (When, Why)

- Novel indication
- No current Guidance Documents
- Unique molecular entity, studies or indications
- New sponsors or new to area of drug development
- Problematic Pharm/Tox signals
- NME
- Avoid protocol changes

Pre-IND meeting

- How do I request a pre-IND meeting?
  - Know your FDA Division
  - All pre-IND submissions addressed directly to the responsible Chief Project Management Staff (CPMS) or other designated Division Personnel until a PIND file is opened

Pre-IND meeting (contd)

- How does FDA track pre-INDs?
  - Divisions assign a pre-IND number, and a PIND file is open. No regulatory prerogatives, only for tracking/filing purposes
  - Generally, as soon as a PIND file is established, an acknowledgment letter is sent to the sponsor
  - All future communications should refer to this PIND number
  - PIND number is converted to IND number after IND submission (number carries over)

End of Phase 1 Meeting (EOP1)

- 21 CFR 312.82
- Generally reserved for drugs for severely-debilitating and life-threatening illnesses that are reviewed under the accelerated approval program
- Objective:
  - to review and reach agreement on the design of Phase 2 controlled clinical trials
  - To discuss the need for, as well as design and timing of studies in pediatric patients

End of Phase 2 Meeting (EOP2)

- 21 CFR 312.47 (b) (1)
- A productive EOP2 meeting can help prevent misunderstandings between Division and Sponsor regarding the drug development program, thus avoiding costly and time consuming attempts at correction later in the process

EOP 2 Meeting (cont)

- Objectives:
  - To obtain agreement on pivotal study designs, and safety and efficacy endpoints for Phase 3 studies
  - To update on progress of PK studies and discuss additional studies needed
  - To assure that pre-clinical data with regard to duration, route of administration, and formulation are supportive of the dose to be used in clinical trials

EOP 2 Meeting (cont)

- CMC
  - To discuss approach to specifications and test methods
  - To discuss “to be marketed” formulation
  - To evaluate appropriate protocols
  - To identify other issues or potential problems (novel regulatory or technical concerns)

EOP2 meeting briefing package

- Summaries of Phase 1 and Phase 2 investigations
- Summary information on plans for Phase 3 trials
- Specific protocols for Phase 3 studies
- Plans for pediatric studies
- Plans for additional non clinical studies (if required)

Pre-NDA/BLA Meetings

- 21 CFR 312.47 (b) (2)
- Critical interaction between CDER staff and the sponsor in ensuring the submission of a well organized and readily reviewable NDA/BLA

Pre-NDA/BLA Meetings (cont)

- Objectives:
  - To determine the adequacy of the sponsor's dossier for the submission of an NDA/BLA
    - For new applications, all electronic submissions must be in eCTD format
  - To agree on format and content of the application (any specific needs?)
  - To determine status of ongoing studies to address pediatric safety and efficacy

Pre-NDA/BLA Meetings (cont)

- Early discussions on priority or standard review, and need for Advisory Committee meetings
  - Advisory Committee meeting is the default for all New Molecular Entities (NMEs)
- May include discussion on the need for REMS (Risk Evaluation and Mitigation Strategies) plans and proposed observational studies

How do I request a meeting with FDA?

- Submission of a meeting request

Guidance for Industry, "Formal Meetings with Sponsors and Applicants for PDUFA Products"

- Product name and application number (if applicable)
- Chemical name and structure
- Proposed indication (s)
- The type of meeting being requested (e.g., Type A, Type B, or Type C)

Guidance for Industry (cont)

- A brief statement of the purpose of the meeting
- A list of specific objectives/outcomes expected from the meeting
- A preliminary proposed agenda
- A draft list of questions, grouped by discipline

Guidance for Industry (cont)

- A list of all individuals (including titles) who will attend the meeting
- A list of Agency staff requested by the sponsor or applicant to participate in the proposed meeting
- The approximate date on which supporting documentation will be sent to the Division
- Suggested dates and times (e.g., morning or afternoon) for the meeting

Establishing the meeting

- The assigned PM will contact sponsor to negotiate date/time of the meeting
- Discussions on materials needed (briefing package), and number of copies
  - "Not too big, not too small"
  - Table of contents
  - List of questions
  - Organized with tabs
  - Submitted on time
  - Adequate number of copies

Establishing the meeting (cont)

- Communication (letter, fax, e-mail) sent acknowledging the meeting date/time, location, attendees
- Arrival and meeting protocols

Types of Meetings

Type	A	B	C
Confirmation of scheduling	14 days	21 days	21 days
Held no later than	30 days	60 days	75 days
Briefing package	2 weeks	4 weeks	4 weeks
Description	Dispute resolution, Clinical holds, Special Protocol Assessment	preIND, EOP1, EOP2, Pre NDA/BLA	Any other than type A or B

Meetings

- For every external meeting there is at least one internal team meeting
  - Pre-meeting/internal meeting
  - Usually, preliminary answers to questions are sent to the sponsor 24-48 hours before the meeting
  - Industry/Sponsor external meeting

Pre-meeting

- Work with Regulatory Project Manager (RPM) to establish agreeable agenda and acceptable list of questions
  - Foreign visitors?
- Notify RPM of any last minute changes (list of attendees, audio/visual equipment)

During the meeting

- Summarize key discussion points, agreements, and action items
- Make sure that your questions have been addressed

Post meeting

- Provide the Division with any meeting hand-outs and/or slides
- Official FDA minutes will be issued within 30 days of the meeting
- Review minutes and notify Division of any discrepancies/clarifications
- Follow-up on any requests

Meetings are not appropriate when

- Information can be condensed in a summary
- Timing is premature
- Right people are not present
- There is missing information

General comments

- Face to face meetings are not the only way to obtain feedback and advice
- Schedule meetings to discuss specific issues
- Utilize guidance documents to the fullest
- “What ifs” are difficult to address
- Meetings are more productive with focused and specific questions. Do not schedule meeting to obtain pre-review of data
- The Agency will provide guidance/comments on your proposals

Tips

- Communicate clearly with the FDA RPM
- Work with RPM to determine agreeable time/day for the meeting
- Know how many copies of the briefing package are needed
- Organize the briefing package with tabs
- Submit focused questions

More tips

- Update changes in attendees
- Presentations?
- Do not add new topics or issues to the original agenda
- Do not ask open ended questions
- Make sure all your concerns/questions have been addressed (or acknowledged) before you leave the meeting

Resources

- www.fda.gov
- http://www.fda.gov/Drugs/default.htm
  - Guidance, Compliance and Regulatory Information
  - About the Center for Drug Evaluation and Research

- http://www.fda.gov/BiologicsBloodVaccines/default.htm
  - Guidance, Compliance and Regulatory Information (Biologics)
  - Contacts in the Center for Biologics Evaluation and Research